

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: Ethicon Wave 3 cases listed in Exhibit A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO LIMIT THE GENERAL OPINIONS OF
DEFENSE EXPERT WENXIN ZHENG, M.D.**

COME NOW the Plaintiffs in this consolidated litigation to respectfully request that this Court limit the general opinions of Defense expert Wenxin Zheng, M.D. The basis for Plaintiffs' motion is explained in the contemporaneously filed Memorandum in Support. The motion is also supported by the exhibits attached hereto, which are listed below.

WHEREFORE, Plaintiffs respectfully request that the Court exclude Dr. Zheng's standard-of-care opinion, including all of the secondary opinions that support his standard-of-care opinion, and that the Court exclude opinions No. 2, 3, 6 and 7 in the section criticizing Plaintiffs' expert Vladimir Iakovlev.

Dated: September 19, 2016

Respectfully submitted,

/s/ Thomas P. Cartmell

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on September 19, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Thomas P. Cartmell

Attorney for Plaintiffs

INDEX OF EXHIBITS

Exhibit A: List of cases on which Wenxin Zheng has been designated as a general expert

Exhibit B: Wenxin Zheng Deposition in *Huskey v. Ethicon, Inc.*, April 3, 2014

Exhibit C: Wenxin Zheng Curriculum Vitae

Exhibit D: Wenxin Zheng Deposition in *Corbet v. Ethicon, Inc.*, BER-L-11575-14 (N.J. Sup. Ct.), Nov. 18, 2015

Exhibit E: Expert Report of Wenxin Zheng, M.D., June 3, 2016